



**ENGINEERING STATEMENT**

**IN SUPPORT OF A  
COUNTERPROPOSAL**

**MM DOCKET 00-6, DA 00-66  
RM-9791**

**The Meadowlark Group, Inc.  
ColoRadio, Inc.**

**Prepared by:**

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**March 6, 2000**

**ENGINEERING STATEMENT**  
**In Support of a**  
**Counterproposal**  
**MM Docket 00-6**  
**The Meadowlark Group, Inc.**  
**ColoRadio, Inc.**

**Summary of Channel Assignments**

(Depicting all communities, channels, and modifications)

<b><u>COMMUNITY</u></b>	<b><u>PRESENT</u></b>	<b><u>PROPOSED</u></b>	<b><u>COMMENTS</u></b>
Limon, CO	229A, 242A, 268A, <b>276C1</b>	229A, 242A, 268A	Delete channel 276C1
Parker, CO	-----	276C	Delete Ch276C1 @ Limon & Change community of license to Parker on Ch 276C
Avon, CO	<b>276C2</b>	<b>249C2</b>	Delete Ch 276C2, Add CH249C2 & change antenna site
Aspen, CO	<b>249C3</b>	<b>276C3</b>	Delete Ch 249C3 and substitute Ch 276C3 (MX channel swap with Ch 276C2 at Avon)
Westcliffe, CO	<b>276A</b>	<b>227A (or 249A)</b>	Use Ch 249A only if Ch 227A is unusable
Imperial, NE	<b>275C</b>	<b>271C</b>	At Site.
McCook, NE	230C2, 241C, 253C1, <b>271C1</b> , 287C1	230C2, 241C, 253C1, <b>275C1</b> , 287C1	MX channel swap with Imperial, NE
Alliance, NE	<b>271C1</b> , 290C1	<b>263C1</b> , 290C1	At site.

**Table 1**

**Engineering Statement**  
**In Support of a**  
**Counterproposal**  
**MM Docket 00-6**  
**ColoRadio, Inc.**  
**The Meadowlark Group, Inc.**

**General**

The instant counterproposal was prepared for ColoRadio, Inc. and The Meadowlark Group, Inc. (herein referred to as "The Petitioners"). Currently The Meadowlark Group, Inc. is the permittee of KAVD, channel 276C1, Limon, Colorado. ColoRadio currently holds an option for the purchase of KAVD. It is prepared and submitted in response to an NPRM for MM Docket 00-6 (see DA00-66). The Petitioners propose to delete channel 276C1 at Limon and subsequently allocate channel 276C at Parker, Colorado in Option #1. Option #2, which is to be considered only in the event Option #1 is not acceptable to the Commission, proposes an upgrade of KAVD to channel 276C with the community of license remaining at Limon. Both options propose that the CP of KAVD be modified accordingly.

The instant counterproposal occurs due to The Petitioners' effort to provide a first local service at Parker, Colorado. The instant scenario seeks the allotment of channel 276C at Parker. The sub-moves (additional spectrum modifications) required for this allotment create a mutually exclusive (MX) with the NPRM in its proposed use of channel 271C1 at McCook, Nebraska. Therefore, if the Commission adopts The Petitioners' counterproposal as submitted, the proposed allotment of channel 271C1 at McCook, as a new local service must be denied. However, The Petitioners counterproposal offers channel 275C1 as a substitute allotment at McCook.

## **Methods**

The Petitioners' counterproposal (Option #1 and Option #2) is presented in sections, with each channel or licensed facility where a change is proposed is discussed individually. All sections begin with an allocation or channel spacing study. The proposed modification's technical compliance is then supported by additional exhibits.

All searches were performed on a V-Soft SearchFM program and verified with the EDX FMSR search program. The FCC F(50,50) contours were calculated using SoftWright's Terrain Analysis Package (TAP) Version 4.00.282. The studies were based on the latest technical data from the Commission's databases. Mapping, population counts, and gain/loss areas were conducted by a professional mapping program from MapInfo Corporation, Version 5.0. The program contains the exact community boundaries of the relevant cities. In pertinent cases where community boundaries were critical, the boundaries were cross-checked with the U.S. Census Bureau's TIGER maps.

All modifications that require a class change or antenna site modification have a gain/loss study for population and square kilometers. For the substitution of channel 276C for channel 276C1, The Petitioners demonstrate that if The Commission treats KAVD.C as a maximum class C1, the amount of gray area eliminated far outweighs the amount of gray area created. If The Commission treats KAVD at its current CP facility, gray area is eliminated, and no new gray area is created.

## **Nature of the The Petitioners Counterproposal**

A summary of all communities and their related channels (present and proposed) is included in Table 1 for reference. The Petitioners proposes to delete channel 276C1 at Limon and substitute channel 276C at Parker, Colorado for use by KAVD. In order to

accomplish this, various channels and licensed facilities are proposed to be modified in order to create compliance with §73.207. The counterproposal provides for first local services at Parker, Colorado, and an increase in square kilometers covered. This is demonstrated by the large increase in the number of persons served by the new 60-dBu contour.

The allotment of channel 276C at Parker requires the following modifications:

I.) KZYR - channel 276C2, Avon, Colorado. Presently KZYR, Avon, Colorado, operates on channel 276C2. If KAVD operates on channel 276C at the proposed counterproposal reference coordinates, it creates a short-spacing to KZYR of 40.49 kilometers. The instant counterproposal requires the substitution of channel 249C2 for channel 276C2 (KZYR) and a minor site modification.

A.) KSPN - channel 249C3, Aspen, Colorado. In order to allocate channel 249C2 at Avon, the current KZYR channel of 276 must be substituted for channel 249C3 at the licensed site of KSPN, Aspen, Colorado. This is a mutually exclusive channel swap. KSPN currently operates as a licensed class A; however, it has an allocation for a class C3 at its licensed site. The instant counterproposal respects the class C3 allotment. No additional spectrum changes are required for the substitution of channel 249C3 for channel 276C3 at Aspen.

II.) AL276A - channel 276A, Westcliffe, Colorado. In a previous rulemaking, a petitioner proposed the allotment of channel 257A at Westcliffe, Colorado. In order to eliminate conflict with another pending docket, The Commission, on its own motion, proposed the allotment of channel 276A in lieu of channel 257A. However, if KAVD operates on channel 276C at the proposed reference coordinates, it creates a short

spacing to AL276A at Westcliffe of 26.30 kilometers. Therefore, The Petitioners offer channel 227A at the channel 276A reference coordinates as a viable substitution.

However, if for some reason unknown to The Petitioners, channel 227A is not available as a substitute channel at Westcliffe, channel 249A is also offered as a substitute. The substitution of channel 249A requires a reference site modification, but it meets all the requirements of §73.207 and §73.315.

III). CP275C - channel 275C, Imperial, Nebraska. Presently a construction permit exists for channel 275C at Imperial, Nebraska. If channel 276C is allocated to Parker at the proposed reference coordinates, it creates a short spacing to the CP on channel 275C at Imperial of 5.45 kilometers. Therefore, The Petitioners offer channel 271C as a substitution for channel 275C at the CP275 authorized reference coordinates. The substitution of channel 271C at Imperial requires two additional sub-changes.

A.) AD271C1 - channel 271C1, McCook, Nebraska. Presently a NPRM is seeking comments on the allotment of channel 271C1 to McCook as that community's fifth FM broadcast service. The substitution of channel 271C for channel 275C at the CP reference coordinates at Imperial creates a short spacing of 163.66 kilometers to the proposed allotment of channel 271C1 at McCook. **This is the MX point with the instant NPRM and The Petitioners counterproposal.** However, The Petitioners propose the substitution of channel 275C1 in lieu of channel 271C1 at the McCook allocation coordinates. This a mutually exclusive channel swap and does not conflict with the allocation of channel 276C at Parker. This channel swap requires no other spectrum changes.

B.) KPNY - channel 271C1, Alliance, Nebraska. Presently KPNY operates on channel 271C1. If channel 271C is substituted for channel 275C at Imperial, a short space of 86.80 kilometers is created. Therefore, The Petitioners propose to substitute channel 263C1 for channel 271C1 at Alliance. This substitution can be accomplished at the licensed coordinates of KPNY with no additional spectrum changes.

### **EXHIBITS EXPLAINED**

#### **KAVD**

Exhibit E, Figure 1 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 276 at Parker. The study depicts all of the major on-channel and adjacent channel modifications required, but not the subchanges. Exhibit E, Figure 2 is a map generated using the programs and techniques in the Methods section of the instant counterproposal. This study depicts the KAVD channel 276C allotment coordinates, a maximum class C 70 dBu contour, and the community boundaries of Parker. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 3 is a map demonstrating the gain and loss area of the respective 60 dBu contours for KAVD. The CP for KAVD is treated as a maximum class C1, and a hypothetical 60 dBu for that facility is shown accordingly. Exhibit E, Figure 3A is a map depicting the gray area. The study demonstrates that if KAVD is considered as a maximum class C1 at its class C1 reference coordinates and at its proposed class C coordinates, gray area is both created and eliminated. The gray area created is 17 square kilometers and has a population (according to the estimated 1999 US Census figures) of 3 persons. The gray area eliminated has a total area of 575 square kilometers and a

population of 125 persons. (The only service to these gray areas is KOA-AM, Denver, Colorado.) Exhibit E, Figure 3B is a comparison of the 60 dBu of KAVD at its authorized class C1 site with its authorized technical facility. This 60 dBu is compared with the 60 dBu of KAVD at the channel 276C proposed reference coordinates at Parker. If this comparison is used, no loss area (and hence, no gray area) is created. However, as shown Exhibit E, Figure 3C, an area of 1,892 square kilometers receives a second aural service. This area contains a population of 1,062 persons. Exhibit E, Figure 3D compares the gray area eliminated by comparing the proposed hypothetical class C KAVD 60 dBu to the actual KAVD.C F(50,50) 60 dBu contour.

#### KZYR

Exhibit E, Figure 4 is an allocation study depicting the spacing to all known FM facilities that are affected by the substitution of channel 249C2 for channel 276C2 at The Petitioners modification site for KZYR, Avon, Colorado. The study depicts that one major sub-change is required (the substitution of channel 276C3 for channel 249C3 at Aspen). Exhibit E, Figure 5 is hypothetical 70-dBu contour map showing that channel 249C2 at Avon will remain in compliance with §73.315 of the Commission's Rules. Exhibit E, Figure 6 is a gain/loss study showing the area and population gained and lost within the current and proposed 60-dBu contours.

#### KSPN

As previously discussed, in order for channel 249C2 to be substituted at Avon, channel 249C3 at Aspen must be deleted and substituted with channel 276C3 (MX channel swap). Exhibit E, Figure 7 is an allocation study showing that channel 276C3 can be allocated to Aspen once channel 276C2 at Avon is deleted. This substitution can be accomplished at



the licensed coordinates of KSPN. Channel 276C3 at Aspen is fully spaced to the proposed allocation of channel 276C at Parker by 7.40 kilometers.

#### AL276A

Exhibit E, Figure 8 is an allocation study depicting spacing to all known FM facilities for the substitution of channel 227A for channel 276A at the allocation coordinates of AL276A, Westcliffe, Colorado. Exhibit E, Figure 9 is an allocation study for channel 249A in lieu of channel 276A at Westcliffe. Both studies show compliance with all FCC Rules and Regulations.

#### CP275C

Exhibit E, Figure 10 is an allocation study depicting spacing to all known FM facilities of channel 271C for channel 275C at the authorized site of CP275C, Imperial, Nebraska. This study shows two sub-changes that are required for this substitution.

#### AD271C1

Exhibit E, Figure 11 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 275C1 for channel 271C1 at McCook, Nebraska. The study demonstrates that no additional channel changes (other than the substitution of channel 271C for channel 275C at Imperial) are needed for this substitution. This is a mutually exclusive channel swap. It also demonstrates that the substitution of channel 275C1 at McCook is fully spaced to the proposed allotment of channel 276C at Parker by 76.02 kilometers.

## KPNY

Exhibit E, Figure 12 is an allocation study demonstrating that channel 263C1 can be substituted for channel 271C1 at the licensed site of KPNY. No additional spectrum changes are required to effectuate this substitution.

## OPTION #2

### KAVD

Exhibit E, Figure 12 is an allocation study depicting the spacing to all known FM facilities that are affected by the substitution of channel 276C for channel 276C1 at Limon, Colorado (the current city of license for KAVD). As stated previously, Option #2 only if, for some reason unknown to The Petitioners, channel 276C cannot be allocated to Parker. Exhibit E, Figure 13 is a hypothetical 70 dBu contour map that shows that the Option #2 proposed allotment of channel 276C covers 100% of Limon. Exhibit E, Figure 14 is a gain/loss study comparing the authorized class C1 60 dBu contour to the proposed maximum class C hypothetical 60 dBu contour. Exhibit E, Figure 15 is a KAVD hypothetical maximum class C1/hypothetical maximum gain/loss study. Exhibit E, Figure 16 is a gain/loss study comparing the hypothetical 60 dBu contour for channel 276C1 at Limon to channel 276C at Limon. This shows that no loss area (or gray area) is created.

### The Petitioners Counterproposal Gain-Loss Area

Exhibit E, Figure 16 is a tabulation of the gain/loss area for each facility which requires an antenna location or class change. Stations that are proposed to have only their present channel substituted at their licensed site and require no class change are not included in

this study. It is assumed that the service they would provide with a channel change would not deviate from their current coverage.

The study includes five facilities that have a deviation in their coverage area proposed by the instant counterproposal. Listed in the study is each station's loss and gain area in square kilometers and the population gains and losses in number of persons according to the U.S. Census Bureau's estimated 1999 population figures. It depicts a cumulative total loss area of 964 square kilometers and a gain area of 14,450 square kilometers. The Petitioners counterproposal has a net area gain of 13,486 square kilometers.

The population loss has a cumulative loss of 4,836 persons, while the population gain is 1,501,552 persons. Therefore, the net population gain of The Petitioners' counterproposal is 1,496,716 persons, while eliminating gray area to a net of 122 persons and 548 square kilometers.

### **Conclusion**

The Petitioners' counterproposal has demonstrated that it is in technical compliance with the present Commission Rules concerning such actions. The counterproposal produces a new first local at Parker, Colorado, a community of 5,450 persons (according to 1990 Census Bureau data) via the upgrade of KAVD. It also provides for the elimination of a considerable amount of gray area. Furthermore, it does not deprive McCook of the service proposed by McCook Radio Group, LLC.

## **ENGINEERING STATEMENT**

### **In Support of a Counterproposal**

**MM Docket 00-6, RM-9791**

ColoRadio, Inc.

The Meadowlark Group, Inc

KAVD (FM)

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# ENGINEERING STATEMENT

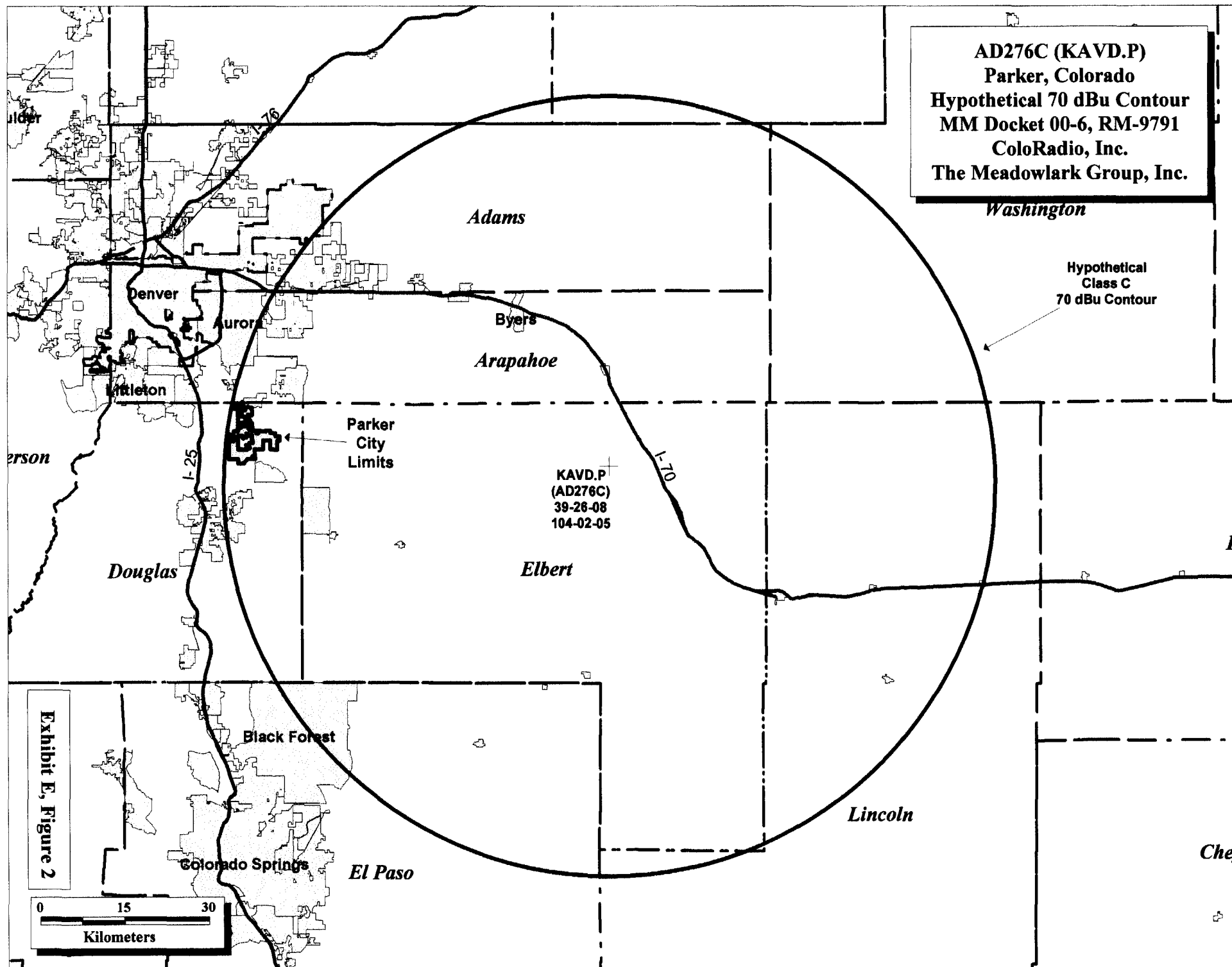
## In Support of a Counterproposal

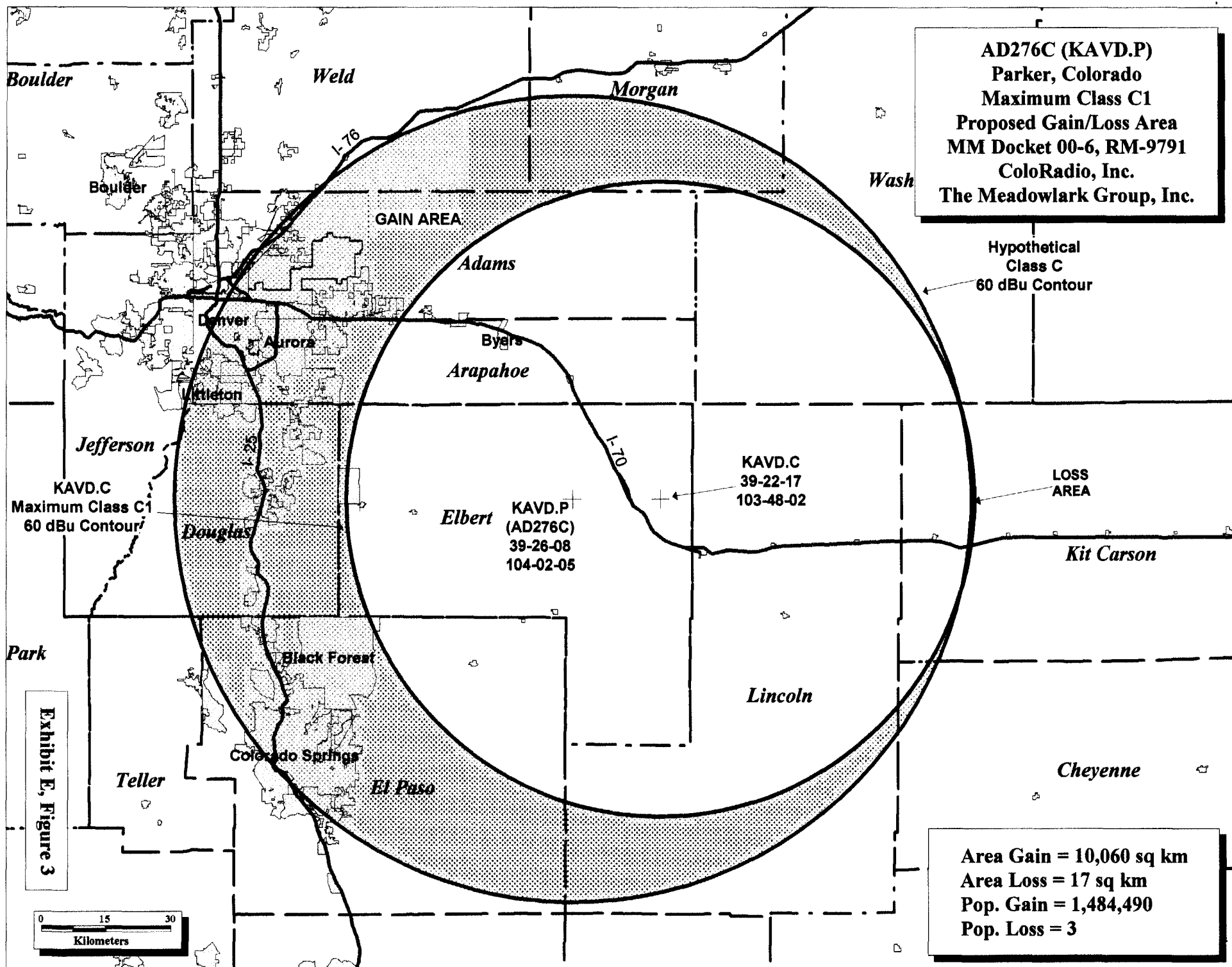
MM Docket 00-6, RM-9791  
ColoRadio, Inc.  
The Meadowlark Group, Inc  
KAVD (FM)

### Allocation study - Ch 276C, Parker, Colorado (KAVD)

[Spacing to all known FM facilities & proposed spectrum modifications]  
(Using proposed Ch 276C (Option I) allotment coordinates as reference)

39 26 08 N.			Class C			Search Date
104 02 05 W.			Current rules spacings			03-02-00
-----			Channel 276A -103.1 MHz	-----		
Call	Ch#	City	State	Bear'	Dist'	R'qrd Margin
-----						
<b>Community of Parker</b>			<b>CO</b>	<b>278.4</b>	<b>63.15</b>	
Reference Coordinates:						
North Latitude: 39-31-07						
West Longitude: 104-45-39						
<b>KAVD.P 276C Limon</b>			<b>CO</b>	<b>121.3</b>	<b>2.43</b>	<b>290.0 -287.57 *</b>
Of No Concern:						
Proposed upgrade reference site of						
KAVD @ Limon in instant counterproposal						
(option II) at;						
NL: 39-25-27, WL: 104-00-38						
<b>KAVD.C 276C1 Limon</b>			<b>CO</b>	<b>109.5</b>	<b>21.39</b>	<b>270.0 -248.61 *</b>
Of No Concern:						
Present authorized site of						
KAVD @ Limon						
<b>KZYR 276C2 Avon</b>			<b>CO</b>	<b>276.1</b>	<b>208.51</b>	<b>249.0 -40.49 *</b>
Of Concern:						
Substitution of Ch 249C2 proposed @						
NL: 39-37-52, WL: 106-27-42						
<b>ALOPEN 276A Westcliffe</b>			<b>CO</b>	<b>220.8</b>	<b>199.70</b>	<b>226.0 -26.30 *</b>
Of Concern:						
Substitution of Ch 227A or						
Ch 249A proposed.						
<b>CP275 275C Imperial</b>			<b>NE</b>	<b>51.4</b>	<b>235.55</b>	<b>241.0 -5.45 *</b>
Of Concern:						
Substitution of Ch 271C Proposed						
Requires two sub-changes						
KRQU	275C	Laramie	WY	329.9	240.57	241.0 -0.43 *
KBIQ	274C	Manitou Springs	CO	223.0	104.82	105.0 -0.18 *
KRFK	278C	Denver	CO	287.6	108.22	105.0 3.22 *
<b>KSPN 276C3 Aspen</b>			<b>CO</b>	<b>264.5</b>	<b>242.43</b>	<b>237.0 5.40 *</b>
Of Note:						
Substitution of Ch 276C3 for Ch 249C3						
Proposed in instant counterproposal						
At KSPN licensed site						
AD223	223C1	Broomfield	CO	357.5	68.75	41.0 27.75
KTRR	273C2	Loveland	CO	326.1	136.35	105.0 31.35
<b>AD275 275C1 McCook</b>			<b>NE</b>	<b>72.7</b>	<b>285.45</b>	<b>209.0 76.02</b>
Of Note:						
Substitution for Ch 271C1 at site						
Proposed in instant counterproposal						
-----						





**AD276C (KAVD.P)**  
**Parker, Colorado**  
**Hypothetical**  
**Gray Area Comparison**  
**MM Docket 00-6, RM-9791**  
**ColoRadio, Inc.**  
**The Meadowlark Group, Inc.**

Gray Area  
Created by  
Proposed  
KAVD Upgrade

Gray Area  
Eliminated by  
Proposed  
KAVD Upgrade

**Pop. Inside Gray Area Eliminated = 125**  
**Pop. Inside Gray Area Created = 3**  
**Area Inside Gray Area Created = 17 sq km**  
**Area Inside Gray Area Eliminated = 575 sq km**

**Exhibit E, Figure 3A**

0 15 30  
Kilometers



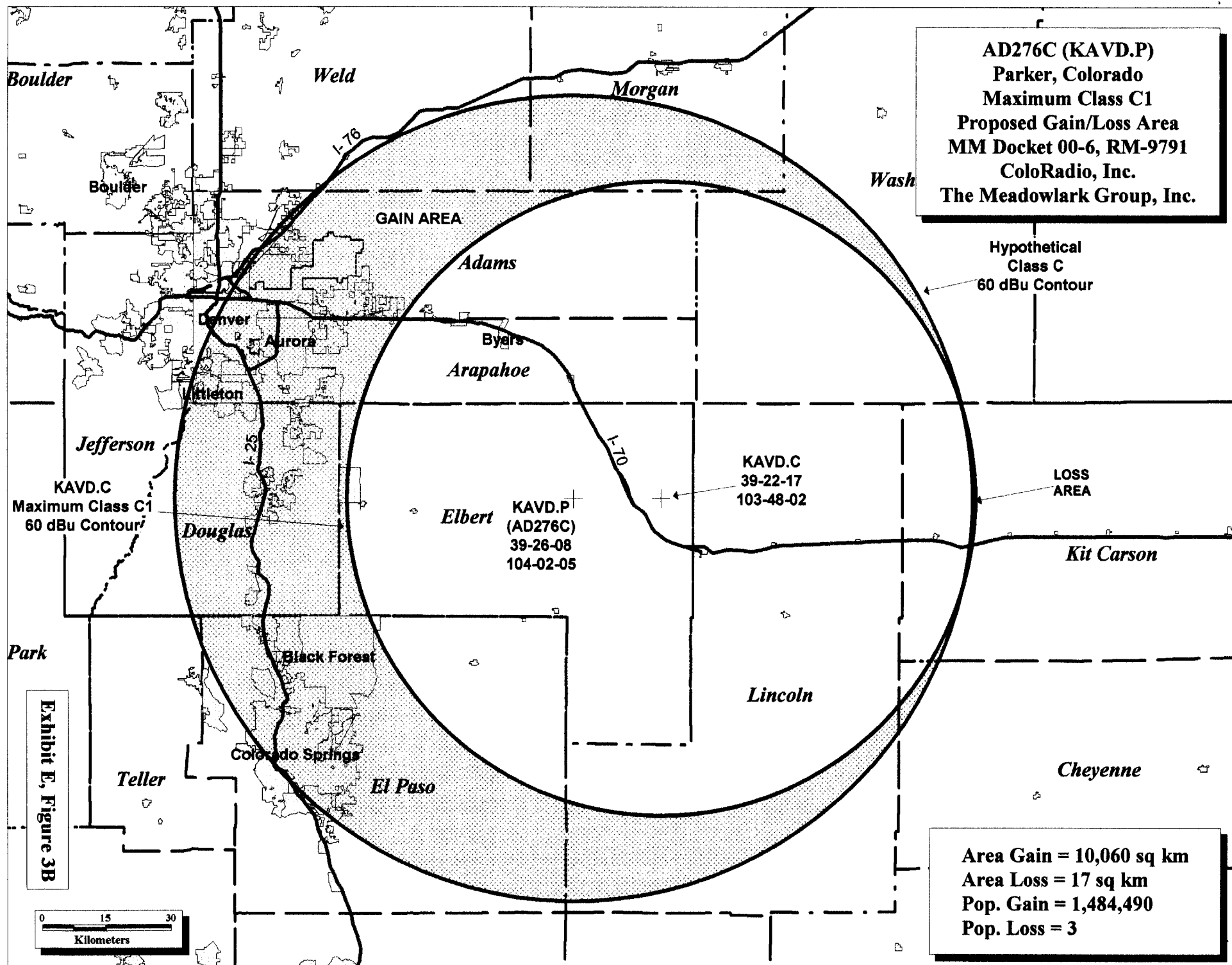
**AD276C (KAVD.P)**  
**Parker, Colorado**  
**Actual Facility**  
**Gray Area Comparison**  
**MM Docket 00-6, RM-9791**  
**ColoRadio, Inc.**  
**The Meadowlark Group, Inc.**

Gray Area  
Eliminated by  
Proposed  
KAVD Upgrade

Exhibit E, Figure 3A

0 15 30  
Kilometers

**Pop. Inside Gray Area Eliminated = 1,062**  
**Pop. Inside Gray Area Created = 0**  
**Area Inside Gray Area Created = 0 sq km**  
**Area Inside Gray Area Eliminated = 1,892 sq km**



**AD276C (KAVD.P)**  
**Parker, Colorado**  
**Hypothetical**  
**Gray Area Comparison**  
**MM Docket 00-6, RM-9791**  
**ColoRadio, Inc.**  
**The Meadowlark Group, Inc.**

Gray Area  
Created by  
Proposed  
KAVD Upgrade

Gray Area  
Eliminated by  
Proposed  
KAVD Upgrade

Exhibit E, Figure 3C

0 15 30  
Kilometers

**Pop. Inside Gray Area Eliminated = 125**  
**Pop. Inside Gray Area Created = 3**  
**Area Inside Gray Area Created = 17 sq km**  
**Area Inside Gray Area Eliminated = 575 sq km**

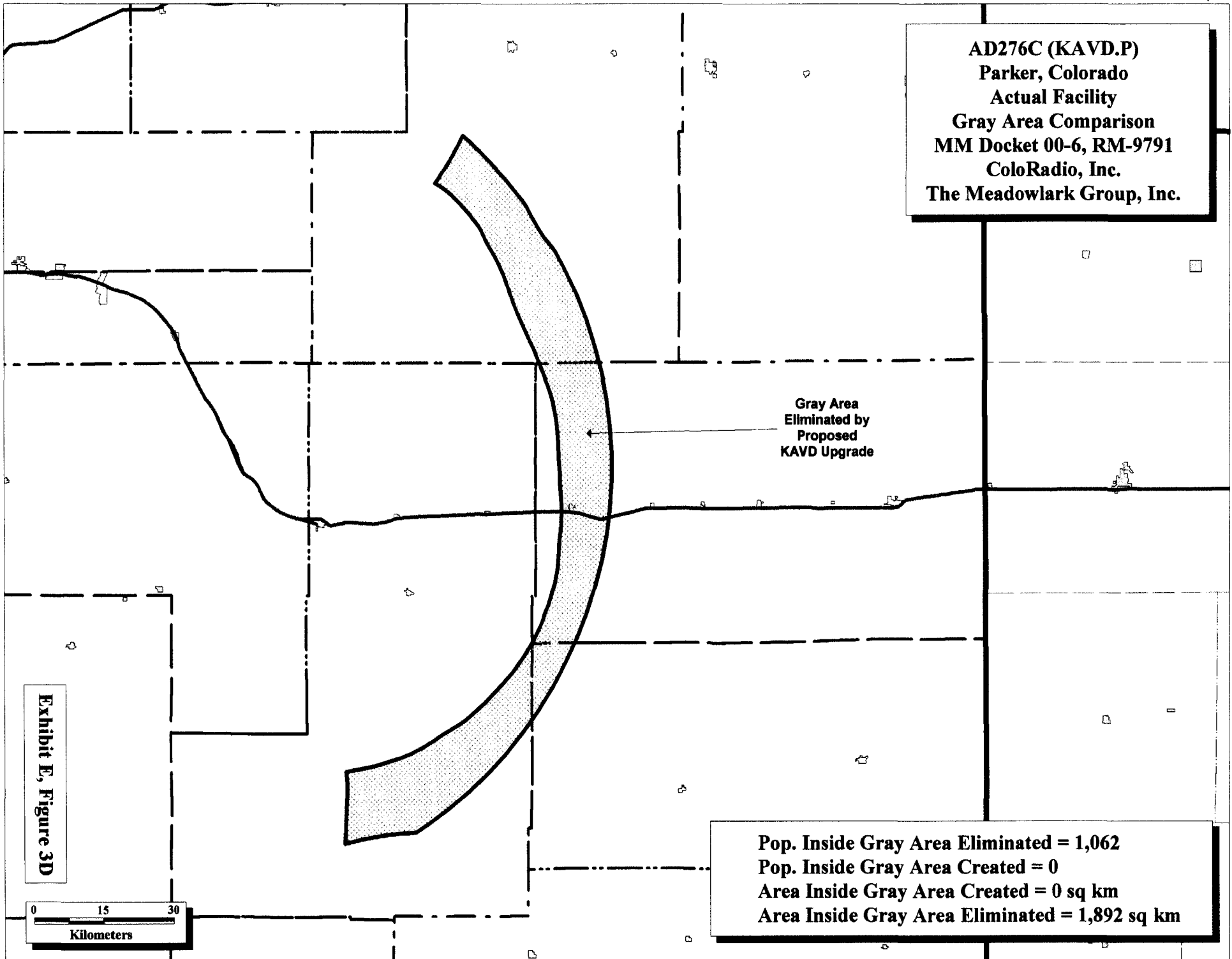
**AD276C (KAVD.P)**  
**Parker, Colorado**  
**Actual Facility**  
**Gray Area Comparison**  
**MM Docket 00-6, RM-9791**  
**ColoRadio, Inc.**  
**The Meadowlark Group, Inc.**

Gray Area  
Eliminated by  
Proposed  
KAVD Upgrade

**Pop. Inside Gray Area Eliminated = 1,062**  
**Pop. Inside Gray Area Created = 0**  
**Area Inside Gray Area Created = 0 sq km**  
**Area Inside Gray Area Eliminated = 1,892 sq km**

**Exhibit E, Figure 3D**

0 15 30  
Kilometers



# ENGINEERING STATEMENT

## In Support of a Counterproposal

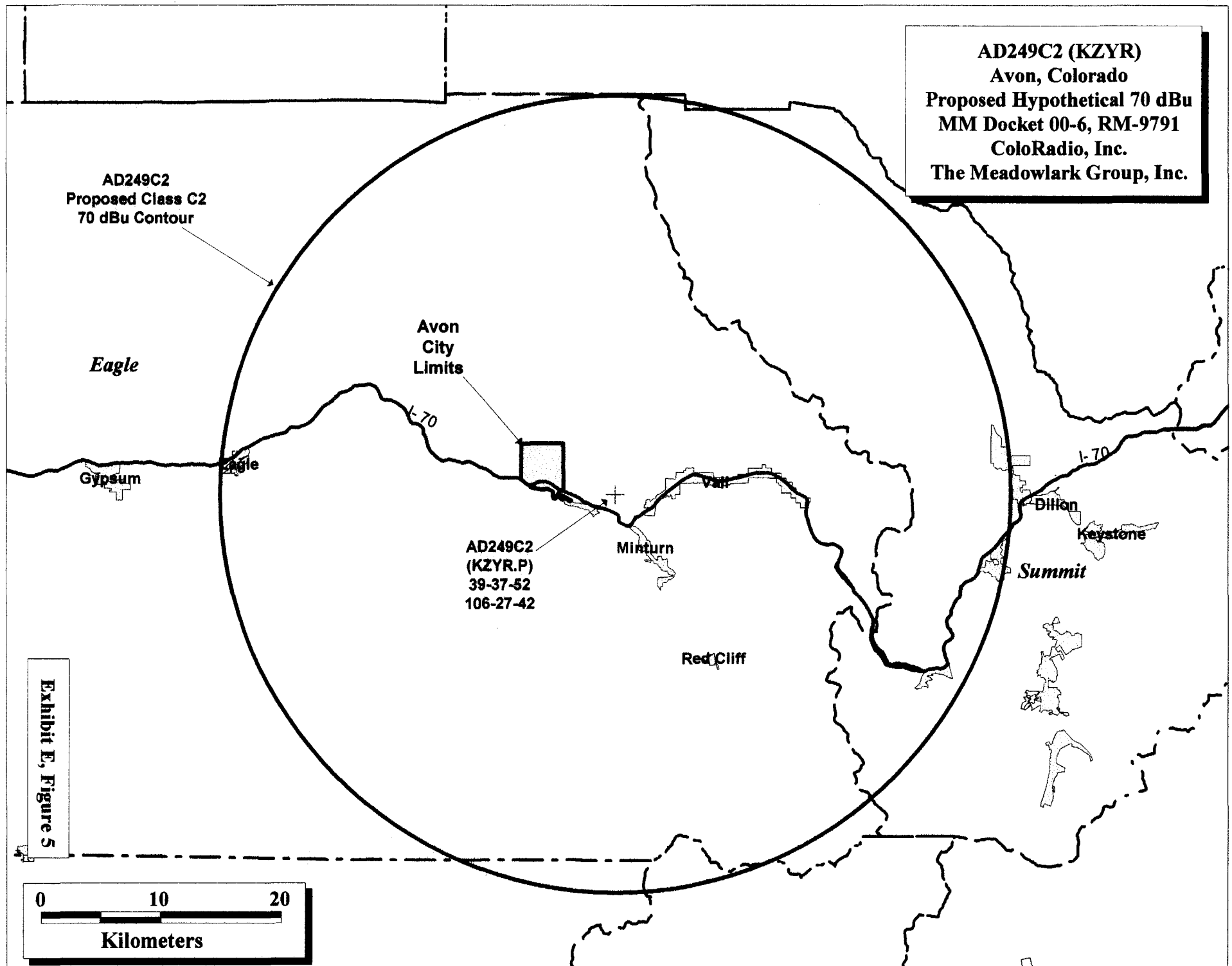
MM Docket 00-6, RM-9791  
ColoRadio, Inc.  
The Meadowlark Group, Inc  
KAVD (FM)

### Allocation study - Substituting Ch 249C2 for Ch 276C2 at Avon, Colorado (KZYR)

[Spacing to all known FM facilities & proposed spectrum modifications]  
(Using proposed Ch 249C2 allotment coordinates as reference)

39 37 52 N.	Class C2				Search Date
106 27 42 W.	Current rules spacings				03-02-00
----- Channel 249 - 97.7 MHz -----					
Call	Ch#	City	State	Bear'	Dist' R'qrd Margin
-----					
<b>Community of Avon</b>			<b>CO</b>	<b>291.3</b>	<b>6.55</b>
Reference Coordinates:					
North Latitude: 39-39-09					
West Longitude: 106-31-58					
<b>KZYR</b>	<b>276C2</b>	<b>Avon</b>	<b>CO</b>	<b>73.0</b>	<b>1.37</b>
Of Note:					
Licensed site of KZYR					
on Ch 276C2					
<b>ALOPEN</b>	<b>249C3</b>	<b>Aspen</b>	<b>CO</b>	<b>215.4</b>	<b>55.21 177.0 -121.79 *</b>
<b>KSPNFM</b>	<b>249A</b>	<b>Aspen</b>	<b>CO</b>	<b>215.4</b>	<b>55.21 166.0 -110.79 *</b>
Of Concern:					
Substitution of Ch 276C3 proposed					
at KSPN licensed site					
KBCOFM	247C	Boulder	CO	72.6	104.98 105.0 -0.02 *
AP249	249C3	Strasburg	CO	93.7	189.82 177.0 12.82
ALOPEN	249C3	Strasburg	CO	87.1	194.35 177.0 17.35
AP249	249C3	Strasburg	CO	87.3	194.51 177.0 17.51
AP249	249C3	Strasburg	CO	87.9	194.78 177.0 17.78
KIGN.C	250C1	Cheyenne	WY	37.5	176.99 158.0 18.99
AP249	249C3	Strasburg	CO	85.9	198.67 177.0 21.67
ALOPEN	248A	Poncha Springs	CO	165.1	128.63 106.0 22.63
<b>AD249</b>	<b>249A</b>	<b>Westcliffe</b>	<b>CO</b>	<b>154.6</b>	<b>194.38 166.0 28.38</b>
Of Note:					
Substitution of Ch 249A for					
Ch 276A in instant counterproposal at;					
NL: 38-03-00, WL: 105-29-59					
KAYW.C	251C	Meeker	CO	285.6	140.34 105.0 35.34
KIGN	250C1	Cheyenne	WY	37.2	204.68 158.0 46.68
-----					

**AD249C2 (KZYR)**  
**Avon, Colorado**  
**Proposed Hypothetical 70 dBu**  
**MM Docket 00-6, RM-9791**  
**ColoRadio, Inc.**  
**The Meadowlark Group, Inc.**



**AD249C2 (KZYR)**  
**Avon, Colorado**  
**Proposed Gain/Loss Area**  
**MM Docket 00-6, RM-9791**  
**ColoRadio, Inc.**  
**The Meadowlark Group, Inc.**

**AD249C2**  
**Proposed Class C2**  
**60 dBu Contour**

**GAIN**  
**AREA**

**KZYR.L**  
**39-38-06**  
**106-26-47**

**LOSS**  
**AREA**

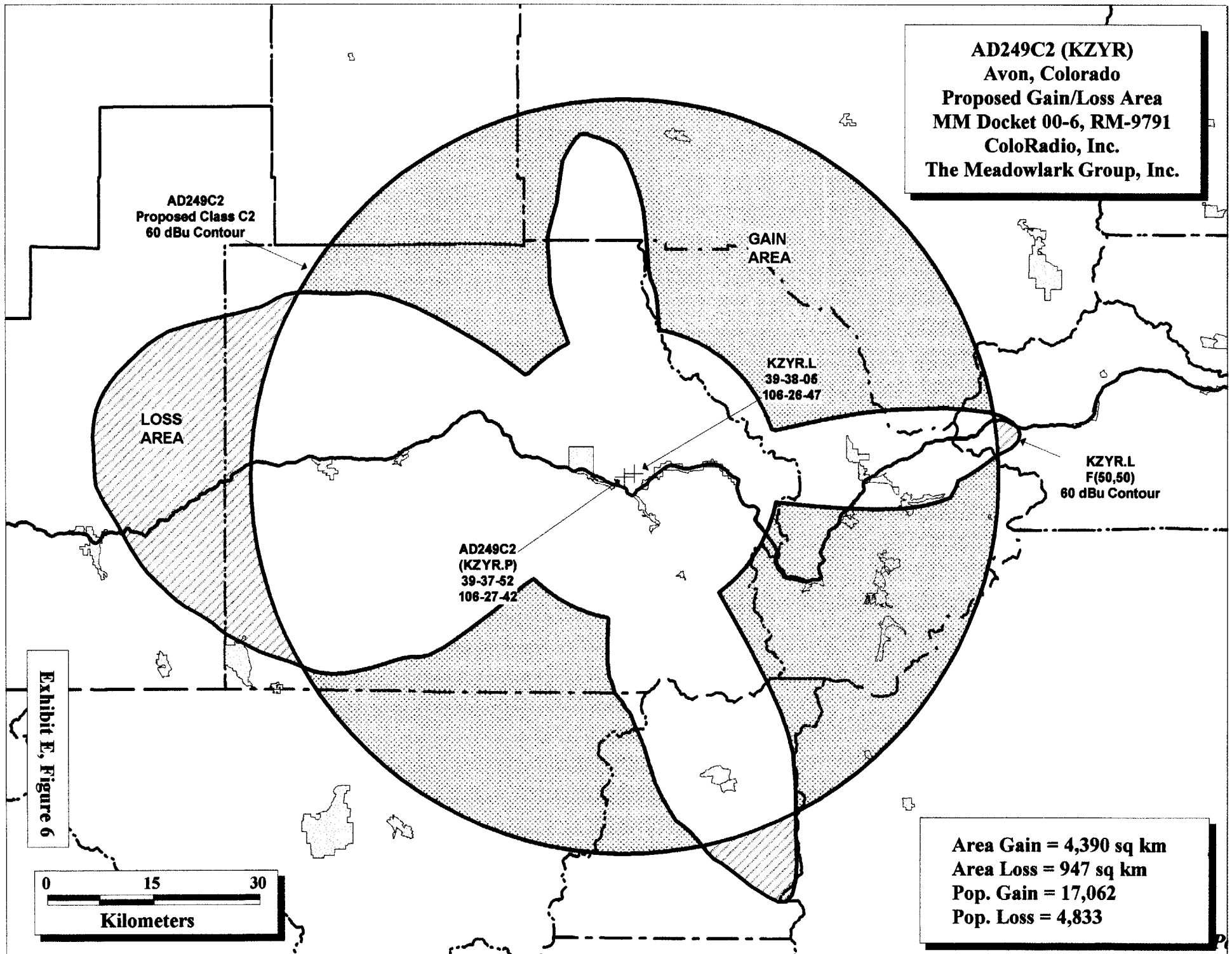
**KZYR.L**  
**F(50,50)**  
**60 dBu Contour**

**AD249C2**  
**(KZYR.P)**  
**39-37-52**  
**106-27-42**

**Exhibit E, Figure 6**

0 15 30  
**Kilometers**

**Area Gain = 4,390 sq km**  
**Area Loss = 947 sq km**  
**Pop. Gain = 17,062**  
**Pop. Loss = 4,833**



# ENGINEERING STATEMENT

## In Support of a Counterproposal

MM Docket 00-6, RM-9791

ColoRadio, Inc.

The Meadowlark Group, Inc

KAVD (FM)

### Allocation study - Substituting Ch 276C3 for Ch 249C3, Aspen, Colorado (KSPN)

[Spacing to all known FM facilities & proposed spectrum modifications]

(Using licensed KSPN coordinates as reference)

39 13 33 N.			Class C3				Search Date
106 50 00 W.			Current rules spacings				03-02-00
-----			Channel 276A -103.1 MHz	-----			
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----							
<b>KZYR</b>	<b>276C2</b>	<b>Avon</b>	<b>CO</b>	<b>36.3</b>	<b>56.31</b>	<b>177.0</b>	<b>-120.69 *</b>
Of Concern:							
Substitution of Ch 249C2							
Proposed at:							
NL: 39-37-52, WL: 106-27-42							
<b>KAVD.P</b>	<b>276C</b>	<b>Parker</b>	<b>CO</b>	<b>84.5</b>	<b>242.43</b>	<b>237.0</b>	<b>5.43 *</b>
Of Note:							
Upgrade of KAVD proposed in							
instant counterproposal (Option I) at;							
NL: 39-26-08, NL: 104-02-05							
<b>KAVD.P</b>	<b>276C</b>	<b>Limon</b>	<b>CO</b>	<b>84.8</b>	<b>244.48</b>	<b>237.0</b>	<b>7.40 *</b>
Of Note:							
Upgrade of KAVD proposed in							
instant counterproposal (Option II) at;							
NL: 39-25-27, NL: 104-00-38							
KPRU.C	277C2	Delta	CO	252.2	126.71	117.0	9.71 *
ALOPEN	276A	Westcliffe	CO	138.6	170.51	142.0	28.51
AL279	279C1	Ridgeway	CO	223.3	110.44	76.0	34.44
AP273	273C	Craig	CO	318.9	138.36	96.0	42.36
AP273	273C	Craig	CO	318.8	143.17	96.0	47.17
ALOPEN	273C	Craig	CO	318.8	143.17	96.0	47.17
AP273	273C	Craig	CO	318.8	143.18	96.0	47.18
AP273	273C	Craig	CO	318.8	143.18	96.0	47.18
KAVD.C	276C1	Limon	CO	86.5	262.12	211.0	51.12
KRFX	278C	Denver	CO	67.8	148.48	96.0	52.48
-----							



# ENGINEERING STATEMENT

## In Support of A Counterproposal

MM Docket 00-6, RM-9791

ColoRadio, Inc.

Meadowlark Group, Inc.

KAVD(FM)

### Allocation Study - Substituting Ch 227A for Ch 276A, Westcliffe, CO (AD 276A)

[Depicting spacing to all known FM facilities]

(Using Ch 276A proposed allotment coordinates as reference)

38 04 28 N.			Class A				Search Date
105 32 13 W.			Current rules spacings				03-03-20
-----			Channel 227 - 93.3 MHz	-----			
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----			-----				
Community of Westcliffe			CO	43.2	9.18		
Reference Coordinates:							
North Latitude: 38-08-05							
West Longitude: 105-27-55							
KSPZ.A	225C	Colorado Springs	CO	38.4	95.02	95.0	0.02 *
KSPZ	225C	Colorado Springs	CO	38.4	95.02	95.0	0.02 *
KALQFM	228A	Alamosa	CO	202.7	72.43	72.0	0.43 *
KTCL	227C	Fort Collins	CO	13.8	231.11	226.0	5.11 *
AD230	230C3	Beulah	CO	114.3	49.81	42.0	7.81 *
AP229	229C3	Salida	CO	314.9	58.51	42.0	16.51
AP229	229C3	Salida	CO	314.9	58.53	42.0	16.53
ALOPEN	229C3	Salida	CO	319.6	60.00	42.0	18.00
AP229	229C3	Salida	CO	318.5	64.14	42.0	22.14
-----			-----				

**ENGINEERING STATEMENT**  
**In Support of a**  
**Counterproposal**  
**MM Docket 00-0, RM-9791**  
 Coloradio, Inc.  
 The Meadowlark Group, Inc.  
 KAVD (FM)

**Allocation Study - Substituting Ch 249A for Ch 276A Westcliffe, CO (AD 276A)**  
 [Spacing to all known FM facilities & proposed spectrum modifications]  
 (Using proposed Ch 249A allotment coordinates as reference)

38 03 00 N.			Class A			Search Date		
105 29 59 W.			Current rules spacings			03-02-00		
-----			Channel 249A - 97.7 MHz	-----				
Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin	
-----			-----					
<b>Community of Westcliffe</b>			<b>CO</b>	<b>17.8</b>	<b>9.88</b>			
Reference Coordinates								
North Latitude: 38-08-05								
West Longitude: 105-27-55								
KKFM	251C	Colorado Springs	CO	35.9	95.00	95.0	0.00	*
ALOPEN	248A	Poncha Springs	CO	315.3	72.04	72.0	0.04	*
<b>KZYR</b>	<b>249C2</b>	<b>Avon</b>	<b>CO</b>	<b>334.6</b>	<b>194.38</b>	<b>166.0</b>	<b>28.38</b>	
Of Note:								
Substitution of Ch 249C2								
for Ch 276C2 proposed in instant								
counterproposal at;								
NL: 39-37-53, WL: 106-27-42								
ALOPEN	249C3	Aspen	CO	318.3	174.70	142.0	32.70	
KGOY.C	249A	Raton	NM	141.9	154.39	115.0	39.39	
AP249	249C3	Strasburg	CO	33.5	195.64	142.0	53.64	
KSPNFM	249A	Aspen	CO	318.3	174.70	115.0	59.70	
ALOPEN	246A	La Jara	CO	205.1	95.23	31.0	64.23	
AP249	249C3	Strasburg	CO	31.8	214.92	142.0	72.92	
AP249	249C3	Strasburg	CO	31.5	216.54	142.0	74.54	
ALOPEN	249C3	Strasburg	CO	31.3	217.05	142.0	75.05	
KISZFM	250C	Cortez	CO	251.9	245.82	165.0	80.82	
AP249	249C3	Strasburg	CO	31.7	222.86	142.0	80.86	

# ENGINEERING STATEMENT

## In Support of a Counterproposal

MM Docket 00-6, RM-9791  
ColoRadio, Inc.  
The Meadowlark Group, Inc  
KAVD (FM)

**Allocation study - Substituting Ch 271C for Ch 275C at Imperial, NE (CP 275)**  
[Spacing to all known FM facilities & proposed spectrum modifications]  
(Using CP 275C coordinates as reference)

40 45 31 N.			Class C				Search Date
101 52 32 W.			Current rules spacings				03-02-00
			Channel 271 -102.1 MHz				
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
<hr/>							
<b>AD271</b>	<b>271C1</b>	<b>McCook</b>	<b>NE</b>	<b>125.7</b>	<b>106.34</b>	<b>270.0</b>	<b>-163.66 *</b>
Of Concern:							
Substitution of Ch 275C1 proposed							
at petitioner's requested coordinates							
<b>KPNY</b>	<b>271C1</b>	<b>Alliance</b>	<b>NE</b>	<b>325.4</b>	<b>183.20</b>	<b>270.0</b>	<b>-86.80 *</b>
Of Concern							
Substitution of 263C1 proposed							
at KPNY licensed site							
KRNY.A	272C1	Kearney	NE	93.9	257.29	209.0	48.29
ALOPEN	272C1	Kearney	NE	93.9	257.29	209.0	48.29
KKCI.A	273C1	Goodland	KS	169.9	154.33	105.0	49.33
KKCI	273C1	Goodland	KS	169.9	154.49	105.0	49.49
KMUSFM	270C2	Burns	WY	279.6	238.56	188.0	50.56
KKQY	270C1	Hill City	KS	133.2	282.07	209.0	73.07
KRNY	272C3	Kearney	NE	92.5	254.43	176.0	78.43
KRKI.C	271C3	Estes Park	CO	260.6	315.75	237.0	78.75
KAGM	272A	Strasburg	CO	238.5	244.96	165.0	79.96

# ENGINEERING STATEMENT

## In Support of a Counterproposal

MM Docket 00-6, RM-9791  
ColoRadio, Inc.  
The Meadowlark Group, Inc  
KAVD (FM)

**Allocation study - Substituting Ch 275C1 for Ch 271C1 at McCook, NE (AD 271)**  
[Spacing to all known FM facilities & proposed spectrum modifications]  
(Using proposed Ch 271C1 allotment coordinates as reference)

40 12 00 N.			Class C1				Search Date
100 51 25 W.			Current rules spacings				03-02-00
----- Channel 275 -102.9 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----							
<b>CP275</b>	<b>275C</b>	<b>Imperial</b>	<b>NE</b>	<b>305.7</b>	<b>106.34</b>	<b>270.0</b>	<b>-163.66 *</b>
Of Concern: Substitution of Ch 271C proposed at CP site of Ch 275C, Imperial, NE							
KKCI.A	273C1	Goodland	KS	213.8	108.22	82.0	26.22
KKCI	273C1	Goodland	KS	213.7	108.33	82.0	26.33
AD276	276C2	Ravenna	NE	60.8	188.36	158.0	30.36
KXNP	278C1	North Platte	NE	5.4	113.07	82.0	31.07
KBRXFM	275C1	O'Neill	NE	37.8	313.97	245.0	68.97
KJLS	277C	Hays	KS	137.7	176.99	105.0	71.99
<b>KAVD.P</b>	<b>276C</b>	<b>Limon</b>	<b>CO</b>	<b>252.3</b>	<b>283.45</b>	<b>209.0</b>	<b>74.45</b>
Of Note: Site & class of KAVD (Option II) proposed in instant counterproposal at; NL: 39-25-27, WL: 104-00-38							
<b>KAVD.P</b>	<b>276C</b>	<b>Parker</b>	<b>CO</b>	<b>252.7</b>	<b>285.02</b>	<b>209.0</b>	<b>76.02</b>
Of Note: Site & class of KAVD (Option I) proposed in instant counterproposal at; NL: 39-26-08, WL: 104-02-05							
<b>KAVD.C</b>	<b>276C1</b>	<b>Limon</b>	<b>CO</b>	<b>250.0</b>	<b>268.42</b>	<b>177.0</b>	<b>91.42</b>
Of Note: Site & class of KAVD before instant counterproposal							
ALOPEN	272C1	Kearney	NE	75.4	177.02	82.0	95.02
KRNY.A	272C1	Kearney	NE	75.4	177.02	82.0	95.02
KHUT	275C1	Hutchinson	KS	134.2	343.01	245.0	98.01
-----							

**ENGINEERING STATEMENT**

**In Support of a  
Counterproposal**

**MM Docket 00-6, RM-9791**

ColoRadio, Inc.

The Meadowlark Group, Inc

KAVD(FM)

**Allocation study - Substituting Ch 263C1 for Ch 271C1 at Alliance, NE  
(KPNY)**

[Spacing to all known FM facilities & proposed spectrum modifications]  
(Using KPNY licensed coordinates as reference)

42 07 01 N.	Class C1					Search	Date
103 07 09 W.	Current rules spacings					03-02-00	
----- Channel 263 -100.5 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----							
KOLZ	264C1	Cheyenne	WY	234.3	193.64	177.0	16.64
AD264	264C1	Sutherland	NE	122.7	197.22	177.0	20.22
AD263	263C1	Casper	WY	285.2	276.72	245.0	31.72
KBFZ.A	261A	Kimball	NE	198.4	108.13	75.0	33.13
KBFZ.C	261A	Kimball	NE	198.4	108.13	75.0	33.13
KFXS.C	262C1	Rapid City	SD	357.2	217.26	177.0	40.26
KFXS	262C1	Rapid City	SD	357.2	217.30	177.0	40.30
-----							

# ENGINEERING STATEMENT

## In Support of a Counterproposal

MM Docket 00-6, RM-9791

ColoRadio, Inc.

The Meadowlark Group, Inc

KAVD(FM)

### Allocation study - Deleting Ch 276C1 and allotting Ch 276C at Limon, CO (KAVD)

[Spacing to all known FM facilities & proposed spectrum modifications]

(Using proposed Ch 276C (OptionII) allotment coordinates as reference)

39 25 27 N.			Class C			Search Date	
104 00 38 W.			Current rules spacings			03-03-00	
-----			Channel 276A -103.1 MHz	-----			
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----			-----				
<b>Community of Limon</b>			<b>CO</b>	<b>122.9</b>	<b>32.77</b>		
Reference Coordinates:							
North Latitude: 39-15-50							
West Longitude: 103-41-29							
<b>KAVD.P 276C Parker</b>			<b>CO</b>	<b>301.3</b>	<b>2.43</b>	<b>290.0</b>	<b>-287.57 *</b>
Of No Concern:							
Reference site for Option I							
in instant counterproposal at;							
NL: 39-26-08, WL: 104-02-05							
<b>KAVD.C 276C1 Limon</b>			<b>CO</b>	<b>107.9</b>	<b>19.02</b>	<b>270.0</b>	<b>-250.98 *</b>
Of No Concern:							
Present CP site of KAVD							
<b>KZYZ 276C2 Avon</b>			<b>CO</b>	<b>276.4</b>	<b>210.73</b>	<b>249.0</b>	<b>-38.27 *</b>
Of Concern:							
Substitution of Ch 249C2 proposed							
at; NL: 39-37-52, WL: 106-27-42							
<b>ALOPEN 276A Westcliffe</b>			<b>CO</b>	<b>221.5</b>	<b>200.14</b>	<b>226.0</b>	<b>-25.86 *</b>
Of Concern:							
Substitution of Ch 227A or							
Ch 249A proposed							
<b>CP275 275C Imperial</b>			<b>NE</b>	<b>50.9</b>	<b>234.75</b>	<b>241.0</b>	<b>-6.25 *</b>
Of Concern:							
Substitution of Ch 271C proposed							
at CP 275C authorized site							
KBIQ	274C	Manitou Springs	CO	224.3	105.36	105.0	0.36 *
KRQU	275C	Laramie	WY	329.7	242.70	241.0	1.70 *
KRFY	278C	Denver	CO	287.9	110.59	105.0	5.59 *
<b>ALOPEN 276C3 Aspen</b>			<b>CO</b>	<b>264.8</b>	<b>244.40</b>	<b>237.0</b>	<b>7.40 *</b>
Of Note:							
Substitution of Ch 276C3 for Ch 249C3							
At KSPN licensed site proposed in							
In instant counterproposal							
AD223	223C1	Broomfield	CO	355.8	70.13	41.0	29.13
KTRR	273C2	Loveland	CO	325.7	138.55	105.0	33.55
-----							

**AD276C (KAVD.P)**  
**Limon, Colorado**  
**Hypothetical 70 dBu Contour**  
**MM Docket 00-6, RM-9791**  
**ColoRadio, Inc.**  
**The Meadowlark Group, Inc.**

*Washington*

Hypothetical  
Class C  
70 dBu Contour

*Adams*

Denver

Aurora

Byers

*Arapahoe*

*Douglas*

KAVD.P  
(AD276C)  
39-25-27  
104-00-38

*Elbert*

Limon  
City  
Limits

*Ki*

Exhibit E, Figure 14

Black Forest

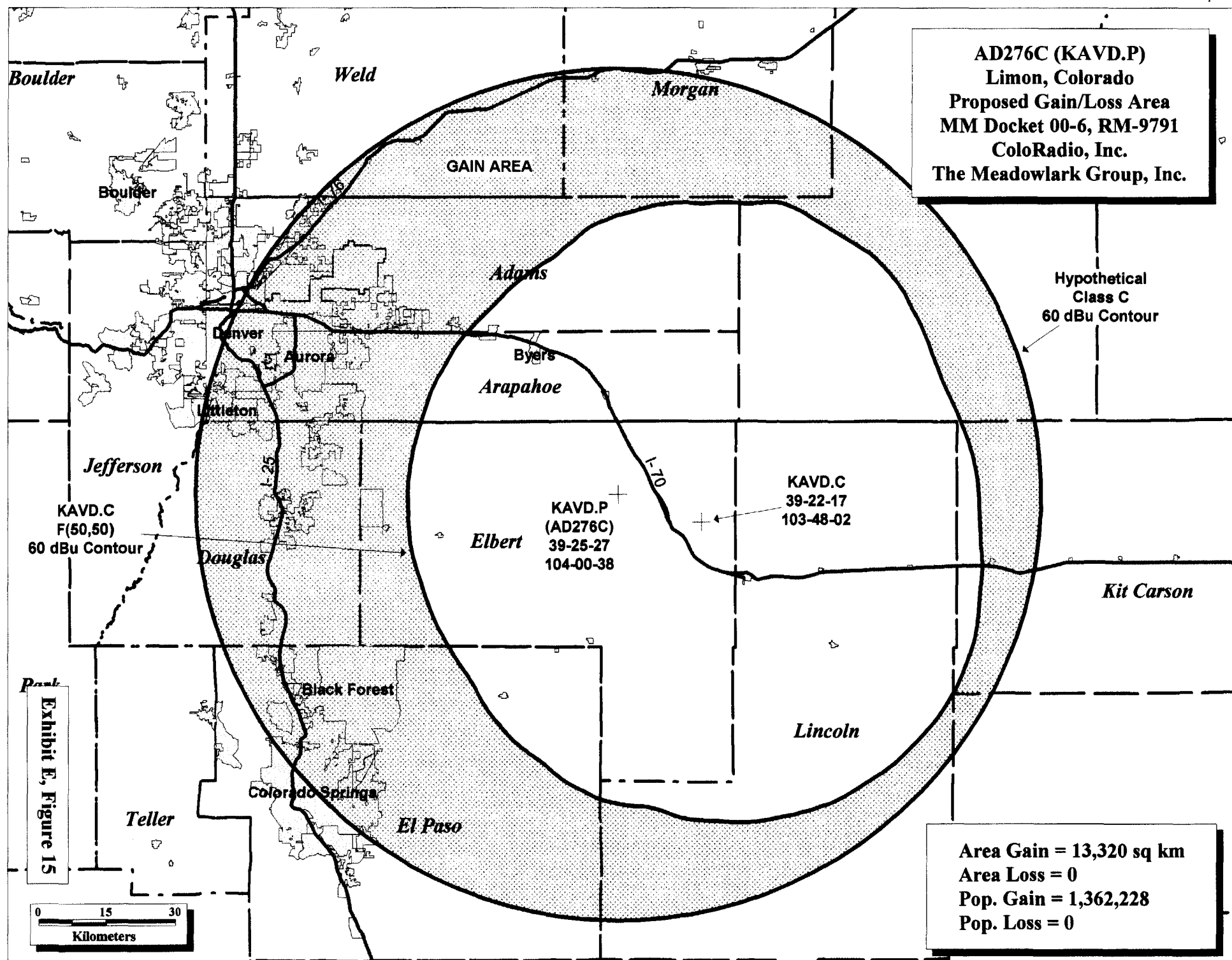
Colorado Springs

*El Paso*

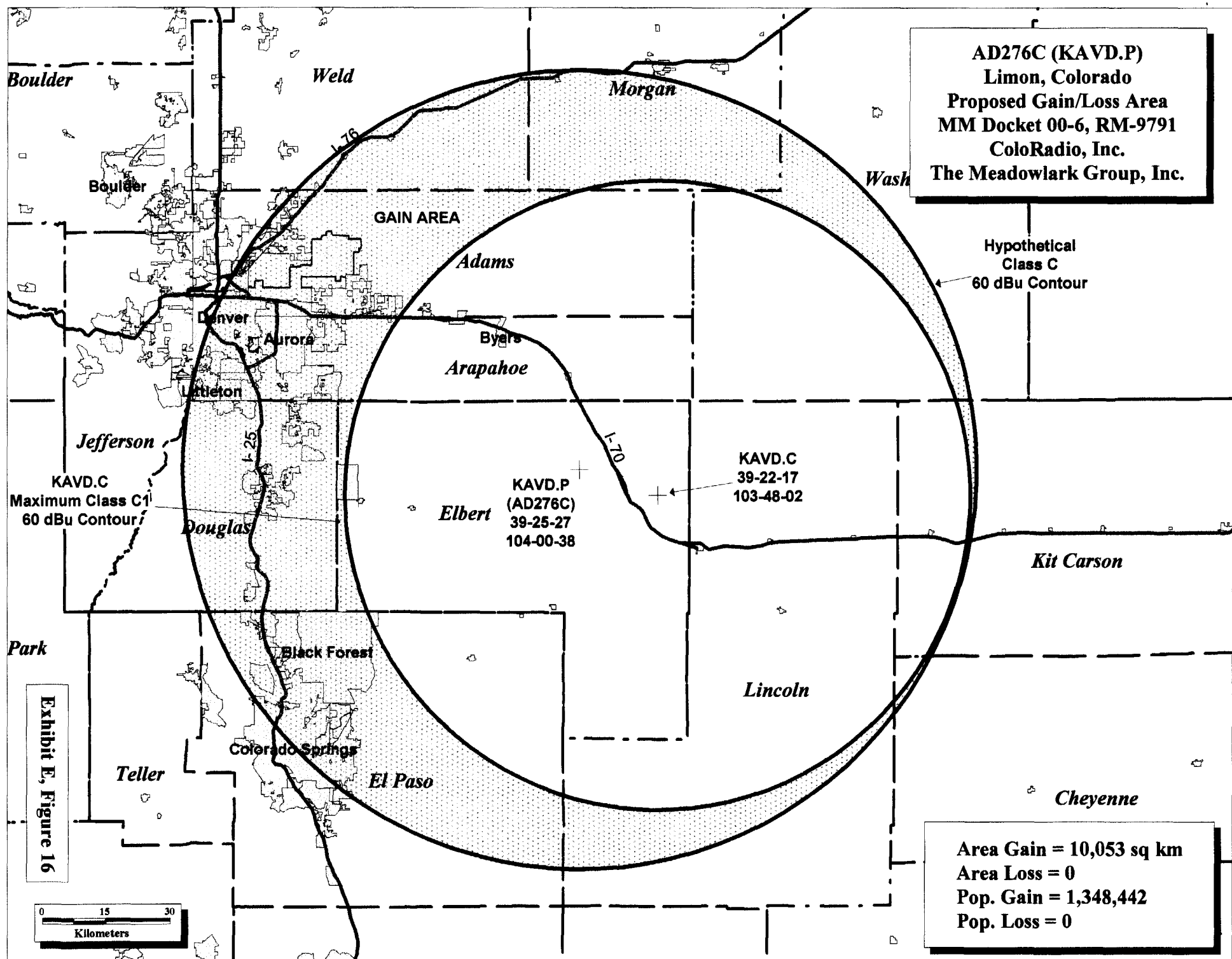
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**ENGINEERING STATEMENT**  
**In Support of a**  
**Counterproposal**  
**MM Docket 00-6**  
**The Meadowlark Group, Inc.**  
**ColoRadio, Inc.**

**Cumulative Gain/Loss Studies**

**Option #1**

**Cumulative Study**

<u>Station</u>	<u>City</u>	<u>Area Gain (sq. km)</u>	<u>Area Loss (sq. km)</u>	<u>Pop. Gain (1999)</u>	<u>Pop. Loss (1999)</u>
KAVD	Parker, Colorado	10,060 (13,340)	17 (0)	1,484,490 (1,515,568)	3 (0)
KZYR	Avon, Colorado	4,390	947	17,062	4,833
<b>Totals</b>		<b>17,470 (17,730)</b>	<b>964 (947)</b>	<b>1,501,552 (1,532,630)</b>	<b>4,836 (4,833)</b>
		<b>Net Totals:</b>		<b>Area Gain (sq. km):</b>	<b>16,506 (16,783)</b>
				<b>Pop. Gain (1999):</b>	<b>1,496,716</b> <b>(1,527,797)</b>

\* Numbers in parentheses assume actual facilities' 60 dBu contours instead of hypothetical contours.

**Option #2**

**Cumulative Study**

<u>Station</u>	<u>City</u>	<u>Area Gain (sq. km)</u>	<u>Area Loss (sq. km)</u>	<u>Pop. Gain (1999)</u>	<u>Pop. Loss (1999)</u>
KAVD	Limon, Colorado	10,053 (13,320)	0 (0)	1,348,442 (1,362,228)	0 (0)
KZYR	Avon, Colorado	4,390	947	17,062	4,833
<b>Totals</b>		<b>14,443 (17,710)</b>	<b>947 (947)</b>	<b>1,365,504 (1,379,920)</b>	<b>4,833 (4,833)</b>
		<b>Net Totals:</b>		<b>Area Gain (sq. km):</b>	<b>13,496 (16,763)</b>
				<b>Pop. Gain (1999):</b>	<b>1,360,671</b> <b>(1,375,087)</b>

\* Numbers in parentheses assume actual facilities' 60 dBu contours instead of hypothetical contours.

# **EXHIBIT A**

Parker, Colorado		
<u>Town</u>	<u>Local Government</u>	<u>Elected</u>
<u>Fire Dept</u>	<u>Parker Library</u>	



**Bewell Net Corp.**, 19555 E. Parker Sq. Dr. Ste. #101  
P.O. Box 126 Parker, CO USA 80134  
Sales (303) 805-BNET[2638] or Toll Free (888) 835-2638  
Tech Support (303) 841-2344

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Questions or problems regarding this web site should be directed to

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Last modified: Tuesday January 12, 1999.

# Participate in Parker

by Gary Lasater, Mayor of Parker

Parker. A town more than 130 years old and 16 years young.\* How do you view it? A place to live or a place to be from? I think most of our residents find Parker a very pleasant place to live, a place they like to call their hometown. By charter, Parker will always be known as a Town. A town evokes images of friendliness, a better pace of life, a place to feel safe, a place that you give and get warm fuzzies! We have an excellent quality of life with our natural open areas, trail system and recreational activities. We also are a destination crossroads for many to stop and shop. These opportunities are increasing at key areas such as Mainstreet, along Parker Road, and with the expansion of E-470.

Let's help make Parker all it can be. Parker's quality of life will be maintained and enhanced with one key element...PARTICIPATION. Participate by shopping at our area merchants. Participate by taking advantage of the myriad of activities the Parker area offers you. After all, it is your hometown - so smile and be proud you are from Parker

\* Parker was incorporated in 1981.



**Bewell Net Corp.**, 19555 E. Parker Sq. Dr. Ste. #101  
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Last modified: Monday November 30, 1998.

# The Bewell NET presents Police -

## *"Communication Cooperation the Key to Public Safety"*

by Tom Cornelius, Chief of Police

When the Town of Parker was incorporated in 1981 there were only a few hundred people living within the Town limits.

The Town has changed many times over in the past fifteen years and change continues to happen but most of us agree that we don't want Parker's intimate community atmosphere to change. The employees of the Parker Police Department believe that Parker can maintain its small town flavor, if community partnerships are developed and dedicated to that purpose.

The men and women who provide public safety services to a community should always play a major role in community enhancement partnerships, but the role of the citizen is every bit as important. No one can be taught something they are unwilling to learn . . . and no community can be kept safe unless it's citizens are willing to actively participate in the effort to make it that way. In other words, the police can't do it for you; we must do it together.

The Parker Police Department strives to be responsive to Parker's unique needs and not just provide the rigid, bureaucratic kind of policing services that are provided in some communities.. We want your help in determining what our priorities should be. Without your assistance, we can only emphasize what WE think is important and you may not agree with our assessment. Please help us determine where we should put most of our effort.

Working together, we can identify and resolve the issues that concern you. To make us aware of those issues, you could make a police report, talk to one of us at a meeting or when you see us in the community, write a letter, call us, or get the information to us any way you can. Please don't be bashful. The key to awareness and cooperation is communication.

There are many things you can do to help make Parker a better place in which to live. Caring about your community and actively participating in worthwhile activities makes a big difference. Organizations, such as church, school, civic, or neighborhood groups, as well as clubs of all kinds, contribute to the improvement of the community. As an example, one group of citizens is currently meeting to find activities for Parker's young people which will help minimize the risk of behavior problems here. The Police Department has volunteer programs for anyone who may be interested, including the Police Reserves, the Explorer Scouts, victim advocate volunteers, and we hope to develop a Citizen's Academy. There is an abundance of worthwhile organizations and activities that benefit Parker in which you can be involved.

Please let us know your feelings about how we are doing. Write to us at P O. Box 4010, Parker, CO 80134, or call us at 841-9800 to let us know your concerns or your compliments about our service.